



LAW OFFICES OF
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August 10, 2020

Via ECF:

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

So ordered.

/s/ Alvin K. Hellerstein
8/11/2020

Re: *United States v. Valle, et. al.*,
Case No. 1:13-cr-00058 (AKH)

Dear Judge Hellerstein:

This office represents Defendant Jancey Valle (“Mr. Valle”) in the above-referenced matter. We respectfully move to modify conditions of Mr. Valle’s release, to allow him to leave his residence for medical purposes, open a bank account and obtain a driver’s license.

By Order dated July 23, 2020, this Court granted Mr. Valle’s compassionate release “subject to home confinement” with “the ability to leave home for employment or to seek employment.” (Doc. No. 753 at ¶ 1.) As part of that motion, Mr. Valle demonstrated that he suffers from Type 2 Diabetes, Hypercholesterolemia, Obesity and Hypertension. Mr. Valle desires to leave his residence to visit the Department of Human Services to apply for Medicaid Health Insurance and thereafter visit medical personnel for purposes of treating his medical conditions. Additionally, Mr. Valle believes that if he obtains a driver’s license his prospective for finding suitable employment will increase. Mr. Valle also desires to open a bank account, so that he can deposit his paychecks.

I conferred with Probation Officer Afonso Fernandes who advised me that under the Court’s current Order (Doc. No. 753) Probation and Pretrial Services may not grant Mr. Valle permission to leave his residence, even for medical purposes. We, therefore, respectfully ask the Court to grant Probation and Pretrial Services permission to allow Mr. Valle to leave his residence:

- 1) for medical related purposes;
- 2) to visit the Department of Motor Vehicles for purposes of obtaining a driver’s permit, driving lessons, and take a road test to obtain driving privileges; and
- 3) to visit a Bank for purposes of opening a bank account.

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Notwithstanding the foregoing, Mr. Valle must notify his probation officer of the location he seeks permission to go to, the timing of such visit, the purpose of such visit, and his probation officer must approve each request prior to Mr. Valle leaves his residence. Upon request, Mr. Valle must provide to his probation officer the bank records of any bank account he maintains during his period of supervised release. If Mr. Valle obtains driving privileges, Mr. Valle may not leave the judicial district without the permission of the court or his probation officer.

I conferred with Probation Officer Afonso Fernandes (973-223-0101) and Assistant United States Attorney Sarah L. Kushner (212-637-2676), they do not object to the foregoing requests.

Respectfully submitted,

/s/ Leopold Gross

cc: Sarah L. Kushner, U.S. Attorney's Office (via ECF)
Afonso Fernandes, Probation Officer (via email)